



Weston Solutions, Inc.  
Suite 1210  
20 N. Wacker Drive  
Chicago, IL 60606-2901  
312-424-3300 • Fax 312-424-3330  
www.westonsolutions.com

EPA Region 5 Records Ctr.



May 17, 2006

Mr. Fredrick Micke, P.E.  
On-Scene Coordinator  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard, SE5J  
Chicago, Illinois 60604

TDD No.: S05- 0301-007

Subject: IWI, Inc. Site  
Federal On-Scene Coordinator's Report, Revision 1

Dear Mr. Micke:

Weston Solutions, Inc. (WESTON®) is pleased to submit two copies of the Federal On-Scene Coordinator's Report, Revision 1, for the IWI, Inc. Site in Summit, Illinois.

Should you have any questions or require additional information, please feel free to contact us.

Very truly yours,

WESTON SOLUTIONS, INC.

Sarah L. Meyer  
START Site Lead

cc: Gail Stanuch, START Project Officer, U.S. EPA, Region V (SE-5J)  
Richard H. Mehl, Jr., START Project Manager, CHI  
file



**REVISION 1  
FEDERAL ON-SCENE COORDINATOR'S REPORT  
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION  
AND LIABILITY ACT  
REMOVAL ACTION AT THE  
IWI, INC. SITE  
SUMMIT, COOK COUNTY, ILLINOIS  
SITE ID: B53J  
NPL STATUS: NON-NPL**

**Prepared for:**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Emergency Response Branch  
77 West Jackson Boulevard  
Chicago, Illinois 60604**

**Prepared by:**

**WESTON SOLUTIONS, INC.  
20 N. Wacker Drive  
Suite 1210  
Chicago, Illinois 60606**

Date Prepared	May 17, 2006
TDD Number	S05-0301-007
Document Control Number	338-2A-AGQQ
Site Specific ID Number	B53J
Contract Number	68-W-00-119
START Project Manager	Richard H. Mehl, Jr.
Telephone No.	(312) 424-3312
U.S. EPA On-Scene Coordinator	Fredrick Micke, P.E.


**REVISION 1**  
**FEDERAL ON-SCENE COORDINATOR'S REPORT**  
**COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND**  
**LIABILITY ACT REMOVAL ACTION AT THE**  
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**77 West Jackson Boulevard**  
**Chicago, Illinois 60604**

**Prepared by:**

**WESTON SOLUTIONS, INC.**  
**20 N. Wacker Drive**  
**Suite 1210**  
**Chicago, Illinois 60606**

Prepared by:  for Date: 5/17/06  
Sarah Meyer, START Site Lead

Reviewed and  
Approved by:  Date: 5/17/06  
Richard H. Mehl, Jr., START Project Manager

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**DATE:** May 17, 2006

**SUBJECT:** ON-SCENE COORDINATOR'S REPORT – CERCLA Removal Action at the  
IWI, Inc. Site, Summit, Cook County, Illinois, Site ID# B53J

**FROM:** Fredrick Micke, On Scene Coordinator  
Emergency Response Branch, SE-5J

**TO:** Linda Nachowicz, Chief  
Emergency Response Branch 2, SE-5J

**THROUGH:** Charles Gebien, Chief  
Emergency Response Branch 3, SE-5J  
Division Superfund

Please find attached the United States Environmental Protection Agency (U.S. EPA) Federal On-Scene Coordinator's (OSC) Report for the removal action conducted at the IWI, Inc. Site (site), Summit, Cook County, Illinois. This report follows the format outlined in the National Oil and Hazardous Substances Pollution Contingency Plan, Section 300.165. The removal was initiated on February 2, 2003, and was completed on October 24, 2003. The OSC for this site was Mr. Fredrick Micke, P.E.

U.S. EPA took this action to mitigate the threats posed by the presence of deteriorating totes and 55-gallon drums containing hazardous materials, asbestos-containing material (ACM) located in decaying site buildings, and hazardous soil both on and adjacent to the site which posed an immediate threat to public health, welfare, and the environment.

Total project costs under the control of the OSC are estimated at \$1,441,651 of which \$1,246,153 was for the Emergency and Rapid Response Services (ERRS) contractor.

In the OSC Report, any indication of specific costs incurred at the site is only an approximation, subject to audit and final definitization by U.S. EPA. The OSC Report is not a final reconciliation of the costs associated with a particular site.

Portions of the OSC Report Appendices may contain confidential business or enforcement-sensitive information and must be reviewed by the Office of Regional Counsel prior to release to the public. The IWI, Inc. Site is not on the National Priorities List.

Attachment

cc: Gail Stanuch – SE-5J  
Carl Norman – SE-5J  
Jerome Kujawa – C-14J  
Richard H. Mehl, Jr. – CHI

**REVISION 1**  
**FEDERAL ON-SCENE COORDINATOR'S REPORT**  
**COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND**  
**LIABILITY ACT REMOVAL ACTION AT THE**  
**IWI, INC. SITE**  
**SUMMIT, COOK COUNTY , ILLINOIS**  
**SITE ID: B53J**  
**NPL STATUS: NON-NPL**  
**TDD: S05-0301-007**

**Removal Dates: February 2, 2003, to October 24, 2003**

**UNITED STATES**  
**ENVIRONMENTAL PROTECTION AGENCY**  
Region V  
Division of Superfund  
Emergency Response Branch

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**Emergency and Enforcement Response Branch  
Office of Superfund, U.S. EPA, Region V**

**OSC REPORT STANDARD APPENDICES LIST \***

Site Name: IWI, Inc. Removal Site, Summit, Cook County, Illinois  
Site ID No.: B53J  
Task Order Nos.: 0071 and 0001

1. Operational Files	<u>ID#</u>
- Action Memos/Additional Funding	1-A
- POLREPs	1-B
- Site Entry/Exit Log	1-C
- Hot Zone Entry/Exit Log	1-D
- Site Safety Plan	1-E
- Equipment & Expendables Log	1-F
- Site Logs	1-G
- Site Computer Disks	1-H
- Daily Work Orders	1-I
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- Newspaper Articles	1-O
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- Enforcement	1-Q
- Other: _____	1-R
2. Financial Files	<u>ID#</u>
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- START Technical Direction Documents	2-B
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- ERCS Invoices	2-D
- RCMS Cost Estimates	2-E
- Subcontractor Bid Sheets	2-F
- START Cost Documentation	2-G
- Other: _____	2-H

**Emergency and Enforcement Response Branch  
Office of Superfund, U.S. EPA, Region V  
OSC Report Standard Appendices List (cont'd)**

3. Technical Files	<u>ID#</u>
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- Disposal Information	3-D
- Drum/Vat/Sample Logs	3-E
- Compatibility Results	3-F
- Chains of Custody	3-G
- Waste Profile Sheets	3-H
- Other: _____	3-I

- \* All files are arranged in chronological order.
- \* Portions of these OSC Report Appendices may contain confidential business information or enforcement-sensitive information and must be reviewed by the Office of Regional Counsel prior to release to the public.
- \* Note that certain files for this site are maintained elsewhere by EERB; these appendices are those files maintained by the OSC during the removal action.

## **EXECUTIVE SUMMARY OF THE REMOVAL ACTIVITY**

**SITE:** IWI, Inc. Site

**LOCATION:** Summit, Cook County, Illinois

**PROJECT DATES:** February 2, 2003, to October 24, 2003

**INCIDENT DESCRIPTION:** The IWI, Inc. site is located at 7738 West 61<sup>st</sup> Place in Summit, Cook County, Illinois. The meridian coordinates of the site are 41° 46' 47" north and 87° 48' 51" west. The site is approximately 1.7 acres, and is rectangular (Figure 1). In the recent past, the site had been used as a chemical drum and tote reconditioning facility. The site was occupied by three dilapidated buildings, the Main Building, the Stack Building, and Building 3. Key features at the site included two large boilers, a smoke stack, large debris piles, two old building foundations, a railroad tank car, a water tower (reservoir removed), above-ground storage tanks (AST), 55-gallon drums, and chemical totes (Figure 2). Evidence of vandalism at the site was extensive, and graffiti was present on most of the site structures.

The site is bounded by industrial and commercial properties to the north, east, and west. A residential neighborhood is located to the south of the site, across 61<sup>st</sup> Place. At the time of the site assessment, chain-link fences owned by the neighboring property owners bordered the site on the north and west sides only. Upon completion of the removal, permanent fencing had been installed by U.S. EPA to complete the site perimeter.

Within 0.25 mile of the site boundary are recreational-use water bodies. The Chicago Sanitary and Ship Canal is located less than 0.75 mile west of the site. The Des Plaines River is located approximately 1 mile west of the site (Figure 1).

**ACTIONS:** On June 14, 2002, U.S. EPA and START conducted an extensive site assessment at the site. Based on the results of this site assessment, which indicated the presence of uncontrolled, hazardous materials at the site, U.S. EPA elected to conduct a removal action.

Support equipment was mobilized to the site on January 21, 2003, and removal activities began on March 10, 2003. At that time, U.S. EPA, START, and ERRS mobilized to the site to begin the staging, sampling, and disposal of the drums and totes, as well as the excavation of the hazardous liquid, sludge, and contaminated soil that existed at the site.

The removal activities were completed on October 24, 2003. ERRS arranged for the transportation and disposal of 278 drums containing hazardous materials; 290 drums containing non-hazardous materials; six totes containing hazardous materials; 44 totes containing non-hazardous materials; 52,300 gallons of hazardous liquid; approximately 11,900 gallons of non-hazardous liquid; approximately 568 tons of hazardous sludge; approximately 756 tons of non-hazardous sludge; 683 tons of hazardous soil; and approximately 10 cubic yards of asbestos-containing material. In addition, 526 pallets of bricks and approximately 278 tons of scrap steel were recycled. Remaining

site structures were a risk to human health due to their dilapidated state; therefore, they were demolished and the site was cleared of all debris. Likewise, the potential risk due to the presence of an open water well inside the courtyard of the Stack Building was eliminated by dismantling and sealing the well.

---

Fredrick Micke, P.E., On-Scene Coordinator  
U.S. EPA, Region 5  
Chicago, Illinois

## **I. SUMMARY OF EVENTS**

### **A. Site Conditions and Background**

#### **1. Initial situation**

The site was most recently used as a tote manufacturing, and drum, tote, and pail reconditioning facility. Operations of this nature discontinued in 1999 and the owner/operator, Mr. Glenn Wellman, has since passed away and the facility has been abandoned. A fire at the site in May 2002 left materials remaining on the site uncontrolled and exposed to weather and elements. The Illinois Environmental Protection Agency (IEPA) referred the site to U.S. EPA following the fire, requesting that a time-critical removal action take place as the material on site posed a threat to the human health and the environment.

The site, a 1.7 acre, rectangular property, is located at 7738 West 61<sup>st</sup> Place, approximately one half block west of Archer Avenue in Summit, Cook County, Illinois ( 41° 46' 47" north and 87° 48' 51" west ). The site is bounded by industrial properties to the north and west, and commercial office property to the east. A residential neighborhood is located to the south of the site, across 61<sup>st</sup> Place. The location of the site is illustrated in Figure 1. According to Region V Superfund Environmental Justice Analysis, the site constitutes an environmental justice priority based on the demographics of the area within one mile of the site; 58% of the population in the area are considered low income, and 81% are considered minorities.

The site consisted of three large buildings in an advanced state of dilapidation; the Main Building, the Stack Building, and Building 3 (Figure 2). In addition, debris piles from two office buildings, which burned during the fire of May 2002, remained on site. Three ASTs, a railroad tank car, 578 55-gallon drums, and 143 chemical totes, ranging in capacity from 345 to 600 gallons, remained on the property at the time of the removal action. Most of the

site containers were deteriorated, rusted, punctured, and/or leaking. The containers primarily contained petroleum, paint waste, and grease.

During a site assessment performed by the Weston Solutions, Inc. (WESTON®) Superfund Technical Assessment and Response Team (START) in 2002, access to the site was unrestricted and hazardous substances were identified in containers on site and in site soils. Eleven of 12 on-site containers that were sampled contained materials that, according to regulations set forth in 40 Code of Federal Regulations (CFR) Chapter 1 Part 261, were classified as characteristic hazardous waste based on their flashpoints (less than 140 degrees Fahrenheit). Site soils contained lead concentrations determined by Toxicity Characteristics Leaching Procedure (TCLP) that exceeded the criteria for a characteristic hazardous waste (Table 1).



<p align="center"><b>Table 1</b>  <b>Characteristic Hazardous Waste Criteria<sup>a</sup> Exceedences in Site Materials</b>  <b>IWI, Inc. Site Assessment Results</b>  <b>June 14, 2002</b>  <b>Summit, Cook County, Illinois</b></p>					
Sample ID	Analysis	TCLP Lead (mg/L)	TCLP Chromium (mg/L)	Flashpoint (degrees F)	Paint Filter Test
	Criteria Level	5.0	5.0	Less than 140	Pass/ Fail
	Sample Type				
IWI-1	waste	DNE	42.4	85	Fail
IWI-2	waste	DNE	DNE	90	Fail
IWI-3	waste	DNE	DNE	85	Fail
IWI-4	waste	7.18	DNE	90	Pass
IWI-5	waste	DNE	DNE	90	Pass
IWI-6	waste	DNE	DNE	105	Fail
IWI-7	waste	281	DNE	95	Pass
IWI-8	waste	DNE	DNE	100	Pass
IWI-10	waste	DNE	DNE	90	Pass
IWI-11	waste	DNE	DNE	75	Pass
IWI-12	waste	DNE	DNE	120	Pass
IWI-14	soil	12.7	DNE	NA	NA

<sup>a</sup> 40 CFR - Chapter 1 Part 261

mg/L - milligrams per Liter

F - degrees Fahrenheit

Pass - No free liquid present

Fail - Free liquid present

DNE - Did not exceed criteria level

NA - Not analyzed

Due to the presence of uncontrolled hazardous substances at the site, the condition of the drums and totes that contained the substances, and the site's proximity to residential and commercial properties, as well as the threat of fire or explosion due to the nature of hazardous materials on site, U.S. EPA prepared an Action Memorandum proposing to complete a removal at the site. Pursuant to the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and 40 CFR 300.415(b)(2), the U.S. EPA approved the removal action on November 29, 2003.

## **2. Location of hazardous substance(s)**

Drums, pails, and totes containing hazardous substances were scattered about the site, both inside and outside the buildings. According to regulations set forth in 40 CFR Part 261, materials contained in the drums, pails and totes contained characteristic hazardous wastes, based on flashpoint, pH, or TCLP metals (lead and chromium) content. Elevated concentrations of total metals (lead, arsenic, and chromium), and benzene, methylethyl ketone, or trichloroethene were also documented in materials on site.

On-site soils collected from the alleys that border the east and west of the site, as well as the storage yard on the north side of the commercial property west of the site, were found to contain concentrations of TCLP cadmium and lead that exceeded the criteria for hazardous waste as set forth in 40 CFR Part 261. In addition, soils collected from the service drive on site were found to contain high concentrations of Diesel Range Organic (DRO) compounds, Gasoline Range Organic (GRO) compounds, and Total Petroleum Hydrocarbons (TPH) as gasoline.

Hazardous liquids collected from on-site totes and sumps, and the railroad tank car, were identified by high concentrations of lead and chromium.

Hazardous sludge was located on site; the material had accumulated on and beneath the floor of the Stack Building. Laboratory analysis determined that the sludge had concentrations of TCLP lead that exceeded regulatory criteria set forth in 40 CFR Part 261, as well as high concentrations of TCLP 1,2-dichloroethane.

### **3. Cause of release or discharge**

Following the closure of IWI, Inc. in 1999, the facility was abandoned. A fire on site in May 2002 destroyed two office buildings and damaged the remaining structures. The extremely dilapidated state of the remaining structures provided little to no protection for the containers on site; and, in some instances, the structures collapsed on top of full containers. Weather and exposure had severely corroded the containers and contents had been released to the site, adjacent drainage ditches, and neighboring property.

### **4. Efforts to locate or obtain response by responsible parties**

U.S. EPA Enforcement and Civil Investigation continues its efforts to locate the companies and individuals that shipped waste products to IWI, Inc. START members documented manufacturing, shipping and product labels on containers during the removal action as evidence for the ongoing investigation.

## **B. Organization of Response**

On January 21, 2003, U.S. EPA, START and ERRS initiated a removal action to address hazardous substances at the IWI, Inc. Site, consistent with the U.S. EPA Action Memorandum. Table 2 summarizes the organization of the response.

**Table 2**  
**Organization of the Response**  
**IWI, Inc. Site**  
**Summit, Cook County, Illinois**

<b>Agencies or Parties Involved</b>	<b>Contact</b>	<b>Description of Participation</b>
U.S. EPA - Region 5 Division of Superfund Emergency Response Branch 77 West Jackson Blvd. Chicago, IL 60604 (312) 886-3337	Fredrick Micke, P.E.	Federal OSC responsible for overall oversight and success of the project.
Weston Solutions, Inc. 20 North Wacker Dr., Suite 1210 Chicago, IL 60606 (312) 424-3303	Sarah Meyer	START contractor responsible for removal oversight, documentation, air monitoring, sample collection, hazard classification of on-site materials, and START-related cost-tracking.
Weston Solutions of Michigan, Inc. 300 River Place, Suite 2800 Detroit, MI 48207 (313) 989-2550	Michael Browning	Additional START contractor.
Earth Tech, Inc. 3121 Butterfield Road Oak Brook, IL 60523 (630)574-2006	Jeffrey D'Agostino	Response Manager responsible for direction of daily ERRS activity. Provided personnel and equipment necessary for removal and coordinated transportation and disposal of waste and hazardous soil and sludge. Also tracked ERRS-related costs.
Earth Tech, Inc. 3121 Butterfield Road Oak Brook, IL 60523 (630)574-2006	James Jahn	Transportation and Disposal Coordinator responsible for determining waste streams for materials on site and procuring proper transportation and disposal of materials.
Village of Summit Building Department 7321 W. 59 <sup>th</sup> Street Summit Argo, IL 60501 (708) 563-4809	Jeffrey Duley	Building Code Enforcement Officer for the Village of Summit, provided some background and history for site and contact information for neighbors and related property owners.
Summit Fire Department 7339 W. 59 <sup>th</sup> Street Summit Argo, IL 60501 (708) 594-3894	Chief Nemeth	Chief of Village Fire Department, offered service of equipment and staff for refilling air tanks one a daily basis during Level B sampling events.

<b>Table 2 (Continued)</b> <b>Organization of the Response</b> IWI, Inc. Site Summit, Cook County, Illinois		
Illinois Environmental Protection Agency (IEPA) Bureau of Land, Division of Remediation Management 1021 North Grand Avenue East Springfield, IL 62794 (217)782-3397	Bruce Everetts	Supervisor, referred site to U.S. EPA for time-critical removal action after fire in May 2002.
SIMALABS International 250 West 84 <sup>th</sup> Drive Merrillville, IN 46410 (219)769-8378	Ronald Misiunas	Client Services Manager responsible for analysis of waste, sludge and soil samples from site and prompt reporting of results to START and ERRS.

OSC – On-Scene Coordinator

ERRS – Emergency and Rapid Response Services

START – Superfund Technical Assessment and Response Team

U.S. EPA – United States Environmental Protection Agency

**C. Injury or Possible Injury to Natural Resources (Non Applicable)**

- 1. Content and time of notice to natural resource trustees**
- 2. Trustee damage assessment and restoration activities**

**D. Chronological Narrative of Removal Actions**

**1. Threat abatement actions taken**

On January 21, 2003, U.S. EPA initiated the removal actions related to this site under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(a). At this time, the ERRS contractor, Earth Tech, Inc., mobilized to the site and began site setup operations. On February 5, 2003, ERRS suspended site setup and site clearing and grubbing operations in order to provide response personnel and equipment for U.S. EPA's effort to recover Space Shuttle Columbia materials in Texas and Louisiana. U.S. EPA and ERRS re-mobilized to the site on March 10, 2003. START

mobilized to the site on March 11, 2003. Cleanup work continued through October 24, 2003.

ERRS began demolition of Rooms 1 and 2 of the Main Building and began preparing the site for the safe staging and sampling of waste containers. Extraction and staging of waste containers (drums and totes) from on-site buildings continued through May 2, 2003, when seven totes that were trapped underneath the caved-in second floor of Room 4 of the Main Building were pulled from the room using chains and straps.

On March 12, 2003, START conducted a visual survey of the site for Presumed Asbestos-Containing Material (PACM). Visual inspection results were documented in a Letter Report (Weston, March 21, 2003). The inspection results indicated that there was PACM on site in eight identified areas. Following the visual inspection, a sampling plan was developed and the on-site PACM was sampled and submitted for laboratory analysis. Sampling was performed by a START member who is an Illinois-licensed Asbestos Inspector. The presence of ACM was confirmed in the following on-site locations: insulation on the railroad tank car, insulation in the boilers and fire doors of the Stack Building, transite tiles identified in a debris pile on site, and steam-pipe wrap. In addition, ACM was presumed to be in the roofing material on all buildings on site. Results of the sampling event are documented in a Letter Report (Weston, October 16, 2003). Although the unstable and unsafe condition of on-site structures dictated that emergency demolition take place, results of the asbestos sampling event dictated that all demolition work proceed using water suppression techniques and the proper use of personal protective equipment to eliminate worker and neighborhood exposure to particulate emissions from site. Demolition work proceeded on site utilizing these techniques.

On March 13, 2003, START initiated work zone and perimeter air monitoring to monitor worker health and safety, and to minimize off-site emissions of airborne contaminants. Nine perimeter air-monitoring stations, as well as any areas downwind of site activity, were screened twice a day with a MultiRAE Five-Gas Analyzer – which analyzes ambient air for

concentrations of carbon monoxide, oxygen, hydrogen sulfide, percent of the lower explosive limit (LEL), and volatile organic compounds (VOC) – and a MiniRAM (dust monitor). No action-level exceedences were documented by the perimeter air monitoring program for the duration of site work. However, a 2,000-gallon capacity water truck was mobilized to the site on March 28, 2003. The truck was used to suppress visible dust that emanated from debris piles and in work areas. Water suppression of dust by this method was used on an as-needed basis.

Sampling of containerized, unknown materials was completed by START between April 9, and June 11, 2003. In total, 143 totes, 578 drums, a railroad tank car, ten sumps, and the sludge that was accumulated on the floor of the Stack Building were sampled during this period. All layers of material in each drum were sampled, classified according to hazard category, and composited for laboratory analysis, where appropriate.

A total of 815 samples from the drums and totes were classified according to hazard. On June 20, 2003, START completed the task of hazard classification of all samples, and identified the following general hazard groups on site: petroleum sludge, grease, paint sludge, organic solvents with possible metals, detergents (bases), oxidizers, and water. On July 11, START completed the compositing of like materials into samples to be submitted for laboratory analysis prior to commencement of disposal operations. A total of 46 composite samples and 60 grab samples of drum, tote and sump contents, and sludge were created and submitted to SIMALABS International, of Merrillville, Indiana, for analysis of waste disposal parameters. ERRS used analytical results from grab and composite sampling to coordinate disposal of all waste material.

Due to the corroded and leaking condition of waste containers on site, and reports from a neighboring property owner of visible liquid waste running off site into adjacent drainage ditches, both on-site and off-site soils were collected for analysis. On July 23, 2003, START collected grab samples from seven locations in the alley to the west of the site. The grab samples were composited into two samples that were submitted for analysis of waste

disposal parameters and British Thermal Units (BTU). Likewise, on August 14, 2003, soil was collected from eight locations in the alley east of the site. Two composite samples and one grab sample of this material were submitted for analysis of waste parameters and BTU.

Laboratory analysis results of soil in the east and west alleys indicated that the soil in the southern and middle portions of both sampled alleys contained TCLP cadmium concentrations that exceeded the criteria for a characteristic hazardous waste (5.0 mg/L). Due to the contamination present in these soils, U.S. EPA elected to excavate the soil to a depth of two feet in these locations. The excavation of this soil took place between September 19 and September 26, 2003, and the areas were backfilled on October 23, 2003.

Based on reports from the owner of the property to the west of the site that he had seen contaminated liquid moving off the site property and onto his, particularly during rain events, soil samples were collected from the storage yard north of the building on that property. On August 18, 2003, START collected three grab samples of soil from the eastern side of the storage yard and submitted them for analysis of waste parameters and BTU. Analytical results indicated that soils in the middle portion of the storage yard contained TCLP cadmium concentrations that exceeded the criteria for a characteristic hazardous waste. Due to the contamination present in this soil, U.S. EPA elected to excavate the soil to a depth of two feet. The excavation of this soil took place from September 30 to October 1, 2003. Confirmation samples were collected from the walls of the excavated area on October 3, 2003. Analytical results indicated that the soil around the perimeter of the excavation was non-hazardous, and the area was backfilled on October 10, 2003.

On October 3, 2003, START collected nine grab soil samples from the service road on the site. Three composite samples were created from the grab samples, dividing the road into three sections. The samples were analyzed for waste parameters, BTU, DRO, GRO, and TPH. Analytical results indicated that the southern portion of the service road contained elevated levels of DROs, GROs, and TPHs as gasoline. Due to the contamination present



in this soil, U.S. EPA elected to excavate the soil in the southern portion of the service road to a depth of two feet. The excavation of this soil took place from October 13 to October 24, 2003, and the area was backfilled with gravel on October 24, 2003.

A water well, located inside the courtyard of the Stack Building, was discovered after demolition of the Stack Building. Inspection of the water well and contents was completed via video camera on October 9, 2003. What appeared to be a thin layer of oil floated on top of the water column of the well. After the inspection, the well was partially dismantled and sealed to prevent potential accidents due to site trespassing.

## **2. Treatment, disposal, and/or alternative-technology approaches pursued**

Thirteen waste streams were identified on site for disposal or recycling, including both hazardous and non-hazardous streams. The shipping dates, volumes shipped, transporter names and disposal facilities are summarized in Table 3.

**Table 3**  
**WASTE DISPOSAL SUMMARY - All Waste Streams**

Site: IWI, Inc.

Site Generator ID#:ILD097179204

Waste Category	Shipment Dates	Quantity/Volume Shipped	Transporter Name/Number	Disposal Method	Disposal Facility/Location
Hazardous Drums	8/18/03 to 9/5/03	278 drums	Perma-Fix of Orlando, Inc. U.S. EPA ID#: FLD980559728	Waste Treatment Plant	Perma-Fix of Michigan, Inc. 18550 Allen Road Brownstown, MI 48192  Perma-Fix of South Georgia, Inc. 1612 James P. Rogers CR. Valdosta, GA 31601
Non-Hazardous Drums	8/12/03 to 9/5/03	290 drums	Page E.T.C., Inc. U.S. EPA ID#: NYD986969947  Perma-Fix of Orlando, Inc. U.S. EPA ID#: FLD980559728	Waste Treatment Plant	Michigan Disposal Waste Treatment Plant 49350 North I-94 Service Drive Belleville, MI 48111  Perma-Fix of Michigan, Inc. 18550 Allen Road Brownstown, MI 48192
Hazardous Totes	9/17/03 and 9/24/03	6 totes	Perma-Fix of Michigan, Inc. U.S. EPA ID#: MID096963194  Perma-Fix of Dayton, Inc. U.S. EPA ID#: OHD004274031	Waste Treatment Plant	Perma-Fix of Michigan, Inc. 18550 Allen Road Brownstown, MI 48192

**Table 3**  
**WASTE DISPOSAL SUMMARY - All Waste Streams**

Site: IWI, Inc.

Site Generator ID#:ILD097179204

Waste Category	Shipment Dates	Quantity/Volume Shipped	Transporter Name/Number	Disposal Method	Disposal Facility/Location
Non-Hazardous Totes	8/15/03 to 9/4/03	44 totes	Able Disposal 809 Wabash Avenue Chesterton, IN 46304 (219) 926-1046	Landfill	Forest Lawn Landfill Inc. 8230 West Forestlawn Road Three Oaks, MI 49128 (616) 756-7532
Hazardous Liquid	8/6/03 to 10/7/03	52,300 gallons	K-Com U.S. EPA ID#: IND984957563  Perma-Fix of Dayton, Inc. U.S. EPA ID#: OHD004274031  Freehold Cartage, Inc. U.S. EPA ID#: ILD097179204	Waste Treatment Plant	Michigan Disposal Waste Treatment Plant 49350 North I-94 Service Drive Belleville, Michigan, 48111  Perma-Fix of Dayton, Inc. 300 S. West End Ave. Dayton, OH 45427-2038
Non-Hazardous Liquid	8/11/03 to 8/15/03	11,900 gallons	Perma-Fix of Dayton, Inc. U.S. EPA ID#: OHD004274031	Water Treatment Plant	Perma-Fix of Dayton, Inc. 300 S. West End Ave. Dayton, OH 45427-2038
Hazardous Sludge	7/30/03 to 9/17/03	568 tons	Ozinga Transportation U.S. EPA ID#: ILR000106211  Perma-Fix of Dayton U.S. EPA ID#: OHD00427403	Landfill	Perma-Fix of Michigan #MID096963194 18550 Allen Road Wyandotte, MI 48192 (734) 282-9250

**Table 3**  
**WASTE DISPOSAL SUMMARY - All Waste Streams**

Site: IWI, Inc.

Site Generator ID#:ILD097179204

Waste Category	Shipment Dates	Quantity/Volume Shipped	Transporter Name/Number	Disposal Method	Disposal Facility/Location
Non-Hazardous Sludge (Sump Solids)	10/14/03 to 10/23/03	756 tons	Homewood Disposal Service, Inc. KR Drenth Trucking, Inc.	Landfill	Forest Lawn Landfill Inc. 8230 West Lawn Road Three Oaks, MI 49128 (616) 756-7556
Hazardous Soil	9/22/03 to 10/24/03	683 tons	U.S. Bulk Transport, Inc. U.S. EPA ID#: PAD987347515  Page, E.T.C., Inc. U.S. EPA ID#: NVD986969947  Triad Transport U.S. EPA ID#: OKD981588791  Jack Gray Transportation U.S. EPA ID#: IND042534875	Waste Treatment Plant	Michigan Disposal Waste Treatment Plant 49350 North I-94 Service Dr. Belleville, MI 48111
Asbestos	8/20/03	10 cubic yards	Waste Management of Illinois (Previously known as WMX-Metro) Special Waste Hauler ID#: 0115	Landfill	Settler's Hill Recycling 1031 East Fabyan Parkway Batavia, IL 60510 (630) 232-7664
Bricks	6/11/03 to 8/15/03	526 pallets	Windy City Bricks	Recycling	Windy City Bricks

**Table 3**  
**WASTE DISPOSAL SUMMARY - All Waste Streams**

Site: IWI, Inc.

Site Generator ID#:ILD097179204

Waste Category	Shipment Dates	Quantity/Volume Shipped	Transporter Name/Number	Disposal Method	Disposal Facility/Location
Scrap Steel	6/10/03 to 9/19/03	278 tons	Ozinga Transportation Systems, Inc.  STAG Iron and Metal Corporation	Recycling	Acme Refining Scrap Iron & Metal Company 3357 S. Justine Chicago, IL 60608  STAG Iron and Metal Corporation 7820 W. 60 <sup>th</sup> Place Summit, IL 60501 (708) 563-2302
Demolition Debris	6/4/03 to 9/22/03	2,113.01 tons	KR Drenth Trucking, Inc.	Landfill	Forest Lawn Landfill Inc. 8230 West Forestlawn Road Three Oaks, MI 49128 (616) 756-7532

Demolition of all site structures was completed on August 11, 2003, and all debris was disposed of or recycled, as appropriate, on an ongoing basis from June through August, 2003. Every effort was made to recycle scrap metal (including empty totes and drums) and intact bricks. A total of 278 tons of scrap metal and 526 pallets of bricks were recycled and recycling reimbursements were retained for cost recovery. A total of over 2,113 tons of construction and demolition debris were disposed of.

Transportation and disposal (T&D) of the hazardous sludge from the boiler room of the Stack Building took place from July 30 to September 17, 2003. In total, ERRS removed approximately 568 tons of hazardous sludge from the site for disposal at an appropriate T&D facility.

T&D of the non-hazardous sludge recovered from on-site sumps took place from October 14 to October 23, 2003. In total, ERRS removed approximately 756 tons of non-hazardous sludge from the site.

T&D of drums and totes took place from August 12 to September 24, 2003. ERRS manifested the final drums on September 5, 2003, and the final totes on September 24, 2003. In total, ERRS disposed of 568 drums (278 hazardous drums and 290 non-hazardous drums) and 50 totes (six hazardous and 44 non-hazardous) to appropriate treatment or disposal facilities.

T&D of hazardous and non-hazardous liquids from the railroad tank car, sumps, and totes took place between August 6 and October 7, 2003. In total, ERRS disposed of 52,300 gallons of hazardous liquids and 11,900 gallons of non-hazardous liquids at appropriate treatment or disposal facilities.

T&D of hazardous soil removed from the alleys that border the site, the storage yard to the west of the site, and the service road on site took place from September 22 to October 22, 2003. In total, ERRS removed approximately 683 tons of hazardous soil.

### **3. Public Information and Community Relations Activities (Non Applicable)**

#### **E. Resources Committed**

##### Extramural Costs:

Total ERRS Contractor Costs:	\$1,246,153
Total START Costs:	\$195,498
Extramural Subtotal	\$1,441,651
 Estimated Total Project Costs	 \$1,441,651
 Project Ceiling	 \$1,445,500

## **II. EFFECTIVENESS OF REMOVAL ACTIONS**

### **A. Actions Taken by PRPs**

The site PRPs took no action with regard to the removal of the hazardous and/or non-hazardous materials located at the site.

### **B. Actions Taken by State and Local Agencies**

The Village of Summit cooperated with U.S. EPA during the removal action by offering background history and ownership information on the site and neighboring properties. In addition, the Village Water Department allowed U.S. EPA contractors to use the municipal water supply to repeatedly fill a 2,000 gallon water truck used for dust suppression and purging the on-site water well during site activities.

The Summit Fire Department provided the use of their equipment and staff in order to refill self-contained breathing apparatus (SCBA) air bottles on a daily basis during Level B sampling events.

### **C. Actions Taken by Federal Agencies and Special Teams**

U.S. EPA divisions of Enforcement and Civil Investigations have been active in identifying and locating PRPs for the site. Work by these divisions is ongoing.

### **D. Actions Taken by Contractors**

The U.S. EPA ERRS contractor, Earth Tech, Inc., conducted the extraction and staging of drums and totes on site, the excavation of hazardous and non-hazardous sludge located



in the Stack Building and in on-site sumps, and the excavation of contaminated soil located on the site and to the west and east of the site. In addition to performing these duties, the ERRS contractor coordinated the transportation and disposal of all hazardous and non-hazardous site materials, and arranged for site security, utilities, and the use of necessary equipment, such as an excavator, Bobcat, and water truck, to perform the above-mentioned tasks. All site subcontractors were procured by ERRS.

The U.S. EPA START contractor, WESTON, provided technical support for U.S. EPA while on site. In addition, the START contractor performed general oversight and documentation of all site activities, air monitoring, multi-media sampling, hazard classification of unknown materials for compositing and disposal, and START-related cost tracking.

### **III. DIFFICULTIES ENCOUNTERED**

#### **A. Items That Affected the Response**

All site structures were dilapidated and, in many areas, had collapsed. The condition of the structures led to the corrosion of the containers that still had hazardous material remaining in them from site operations. The containers were exposed to the weather and elements, and container decay was evident. In addition, the second floor of Room 4 of the Main Building was partially collapsed at the time the removal action began. The second floor structure itself was partially resting on more than 10 totes that were staged on the first floor. These trapped totes had to be dragged out of the building using chains and straps as the collapsing structure made entry into that area of the building and direct contact with the containers impossible.

#### **B. Issues of Intergovernmental Coordination (Non Applicable)**

#### **C. Difficulties Interpreting, Complying With, or Implementing Policies and Regulations (Non Applicable)**

#### **IV. RECOMMENDATIONS**

##### **A. Means to Prevent a Recurrence of the Discharge or Release**

All containers and structures have been removed from the site. No recurrence of discharge or release is expected.

##### **B. Means to Improve Removal Activities (Non Applicable)**

##### **C. Recommendations for New Policy or Regulations, and Changes in Current Regulations and Response Plans (Non Applicable)**

## **V. REFERENCES**

Title 40 – United States Code of Federal Regulations – Protection of the Environment, Part 261 Identification and Listing of Hazardous Waste, 2001.

United States Environmental Protection Agency Action Memorandum – Request to Conduct a Time-Critical Removal Action at the Itasco, also known as IWI Inc. Site, Summit, Cook County, Illinois, November 2, 2002.

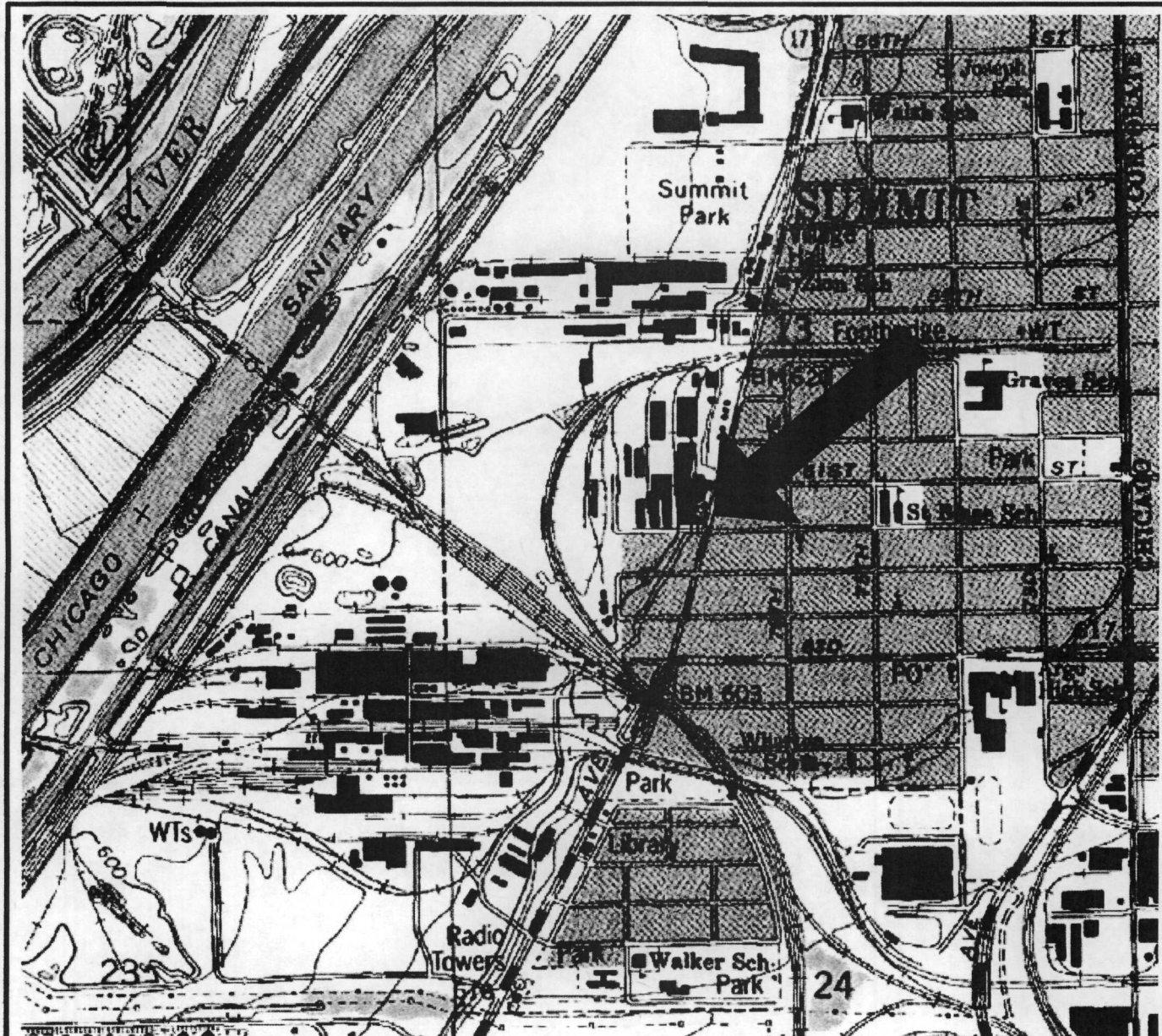
Weston Solutions, Inc. (WESTON) Site Assessment Report for IWI Site, Summit, Cook County, Illinois, October 8, 2002.

WESTON, Letter Report of Results of Asbestos Inspection, IWI, Inc. Site, Summit, Cook County, Illinois, March 21, 2003.

WESTON, Letter Report of Results of Asbestos Sampling , IWI, Inc. Site, Summit, Cook County, Illinois, October 16, 2003.

**Figure 1**

**Site Location Map**



0' ————— .5Km

0' ————— .25Mi

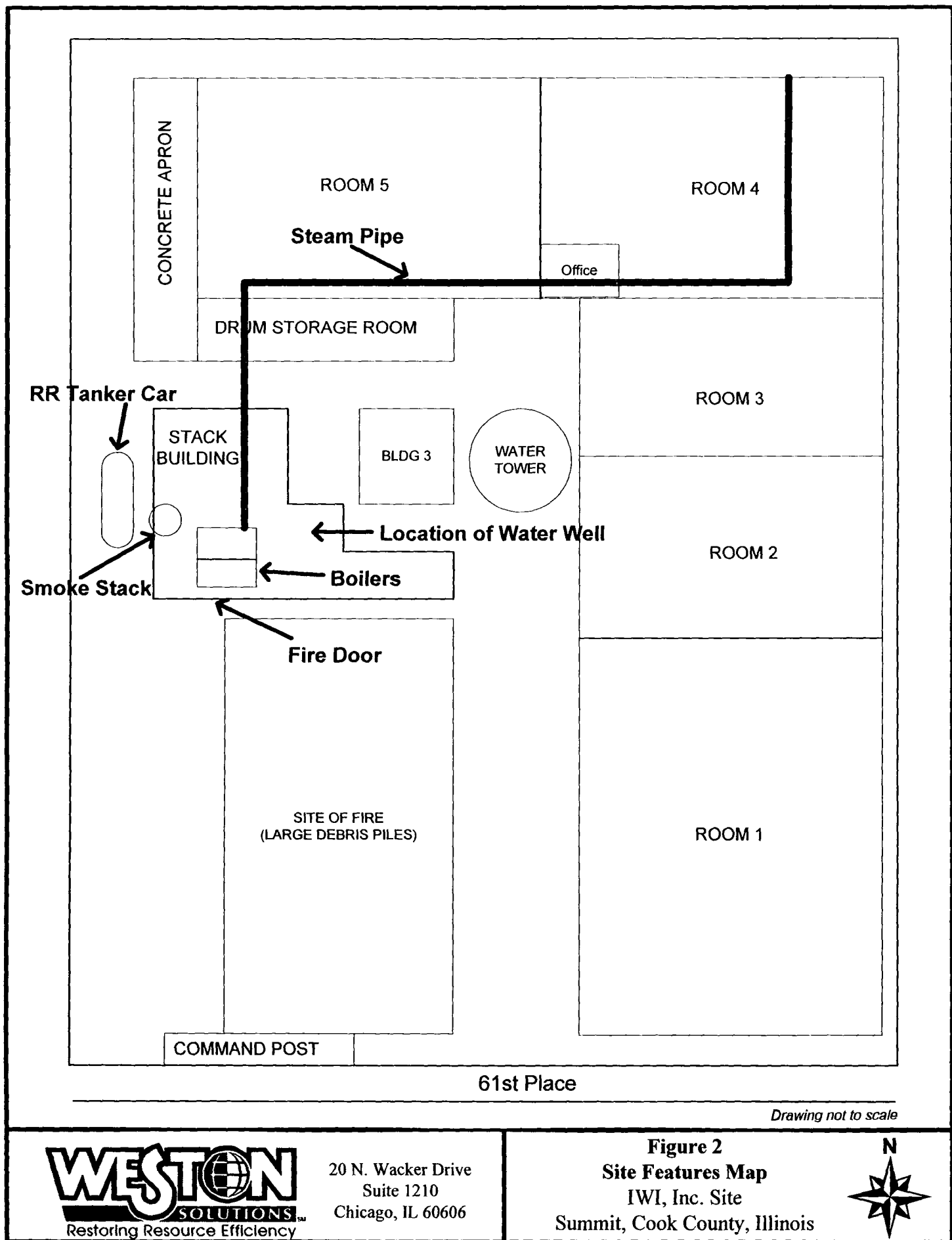
**WESTON**  
SOLUTIONS  
Restoring Resource Efficiency

20 N. Wacker Dr.  
Suite 1210  
Chicago, IL 60606

**Figure 1**  
**Topographical Site Location Map**  
IWI, Inc. Site  
7738 W. 61st Place  
Summit, Cook County, Illinois

**Figure 2**

**Site Features Map**





**Attachment A**

**Photograph Documentation**



**SITE:** IWI, Inc. Site

**DATE:** 25 March 2003

**PHOTO NO:** 1

**DIRECTION:** NE

**SUBJECT:** View of site from 61<sup>st</sup> Place; demolition debris in foreground.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 25 March 2003

**PHOTO NO:** 2

**DIRECTION:** N

**SUBJECT:** View of site from 61<sup>st</sup> Place; early phase of demolition.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 25 March 2003

**PHOTO NO:** 3

**DIRECTION:** NW

**SUBJECT:** Southeast corner of the site.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 26 March 2003

**PHOTO NO:** 4

**DIRECTION:** S

**SUBJECT:** Leaking totes on the concrete apron west of Room 5 of the Main Building.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

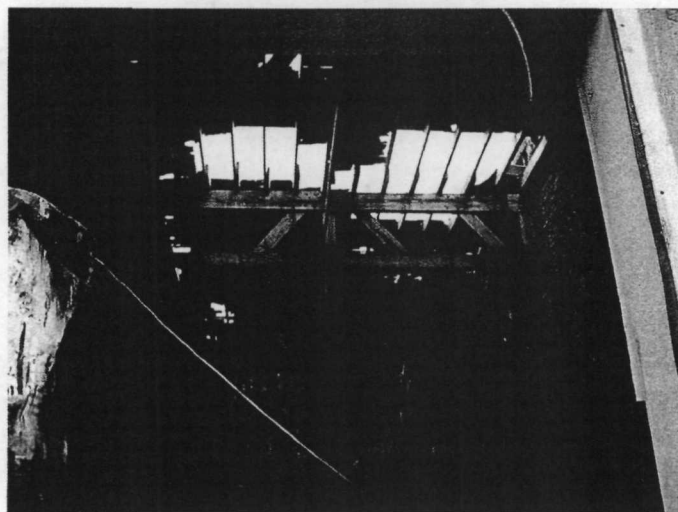
**DATE:** 12 March 2003

**PHOTO NO:** 5

**DIRECTION:** E

**SUBJECT:** Dilapidated Room 4 of the Main Building; the ceiling is caving in over the chemical totes on the first floor.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

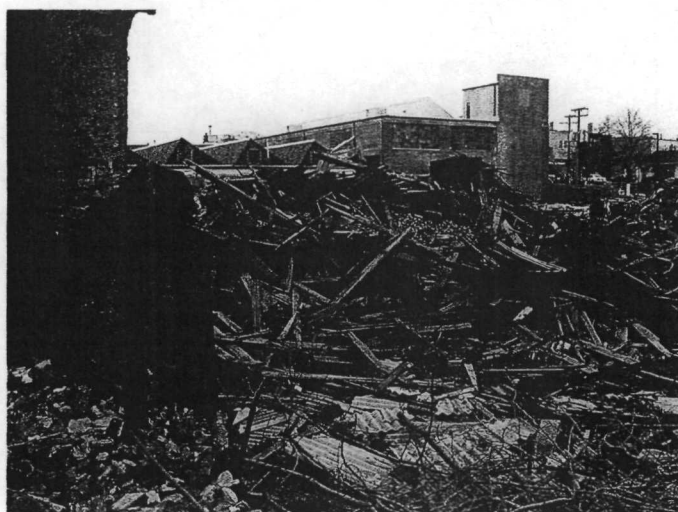
**DATE:** 12 March 2003

**PHOTO NO:** 6

**DIRECTION:** E

**SUBJECT:** Ceiling caving in at drum storage area, west end of Main Building, Room 5.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 12 March 2003

**PHOTO NO:** 7

**DIRECTION:** SE

**SUBJECT:** Debris from fire and demolition of office buildings; transite tiles in foreground.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 13 March 2003

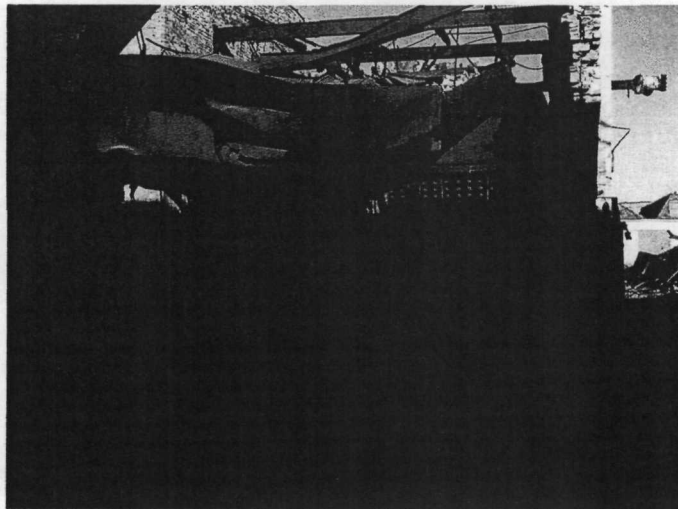
**PHOTO NO:** 8

**DIRECTION:** down

**SUBJECT:** Broken, buried drum in ditch west of Stack Building.

**PHOTOGRAPHER:** S. Meyer





**SITE:** IWI, Inc. Site

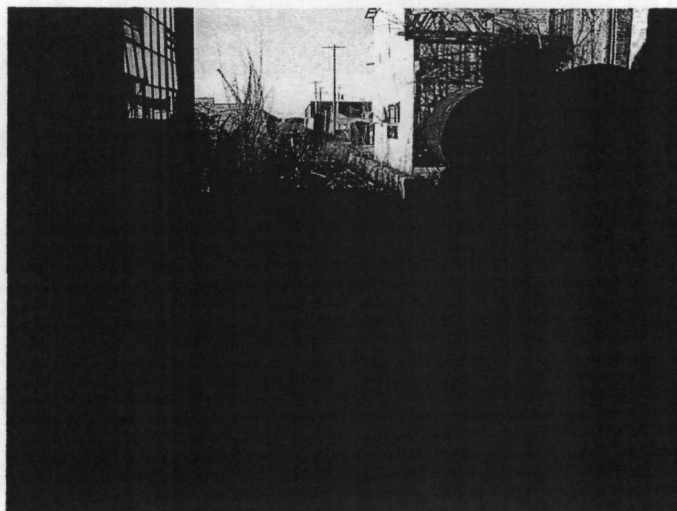
**DATE:** 13 March 2003

**PHOTO NO:** 9

**DIRECTION:** E

**SUBJECT:** Boilers at the west end of the Stack Building.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

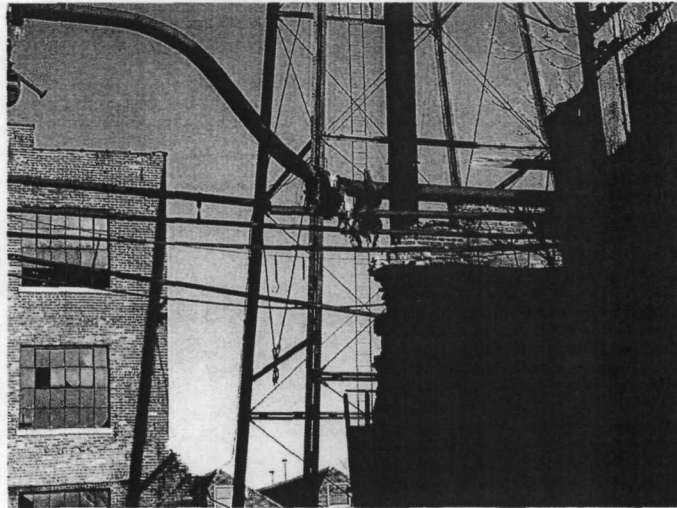
**DATE:** 13 March 2003

**PHOTO NO:** 10

**DIRECTION:** N

**SUBJECT:** Railroad tanker car at the west end of the Stack Building and grubbed easement between site and neighboring property.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 13 March 2003

**PHOTO NO:** 11

**DIRECTION:** E

**SUBJECT:** Overhead steam pipe between the Main Building and the Stack Building. Asbestos containing material is located in the pipe-wrap at the center of the photo.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 13 March 2003

**PHOTO NO:** 12

**DIRECTION:** N

**SUBJECT:** Asbestos containing material in pipe wrap on the steam pipe inside the north end of Stack Building.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 10 April 2003

**PHOTO NO:** 13

**DIRECTION:** E

**SUBJECT:** START members sampling chemical totes of unknown contents in Level B personal protective equipment (PPE).

**PHOTOGRAPHER:** R. Bugg



**SITE:** IWI, Inc. Site

**DATE:** 14 April 2003

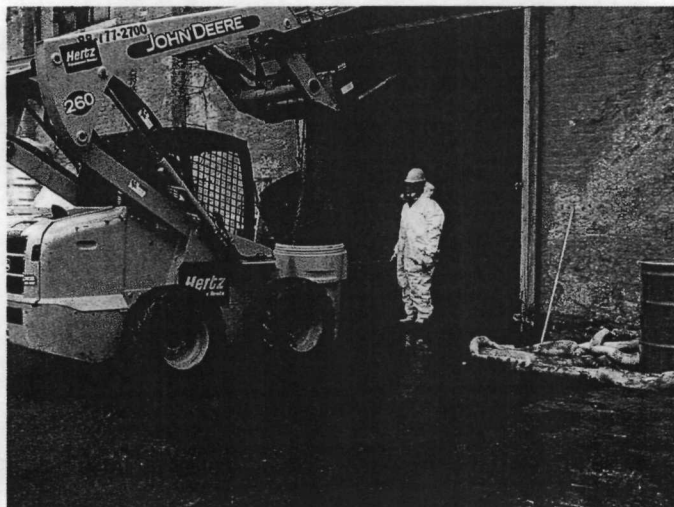
**PHOTO NO:** 14

**DIRECTION:** NE

**SUBJECT:** Unknown drum liquid that has leaked from the drum storage room, boom containment in the foreground.

**PHOTOGRAPHER:** S. Meyer





**SITE:** IWI, Inc. Site

**DATE:** 17 April 2003

**PHOTO NO:** 15

**DIRECTION:** NE

**SUBJECT:** ERRS members loading a corroded drum from drum storage room to a poly overpack.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 22 April 2003

**PHOTO NO:** 16

**DIRECTION:** SW

**SUBJECT:** START member performing hazard classification of tote samples in an on-site fume hood.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 26 April 2003

**PHOTO NO:** 17

**DIRECTION:** NE

**SUBJECT:** ERRS members inside the drum storage room preparing to remove drums.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 28 April 2003

**PHOTO NO:** 18

**DIRECTION:** E

**SUBJECT:** START members sampling overpacked drums with unknown contents using level B PPE.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 4 August 2003

**PHOTO NO:** 19

**DIRECTION:** N

**SUBJECT:** ECC excavator demolishing the north boiler of the Stack Building.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

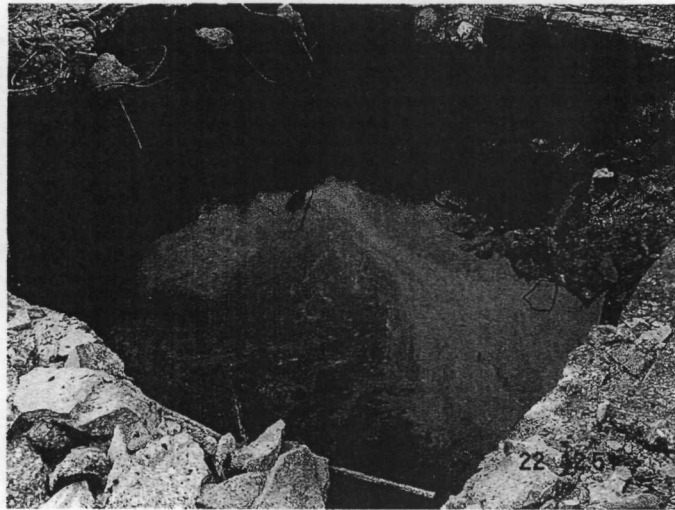
**DATE:** 3 October 2003

**PHOTO NO:** 20

**DIRECTION:** N

**SUBJECT:** North end of excavation at east end of neighboring yard, to the west of Site (samples IWI-SG-19 and IWI-SG-20).

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 22 September 2003

**PHOTO NO:** 21

**DIRECTION:** D

**SUBJECT:** Hole in concrete that reveals the internal structure of Sumps 9 and 10.

**PHOTOGRAPHER:** M. Browning



**SITE:** IWI, Inc. Site

**DATE:** 22 September 2003

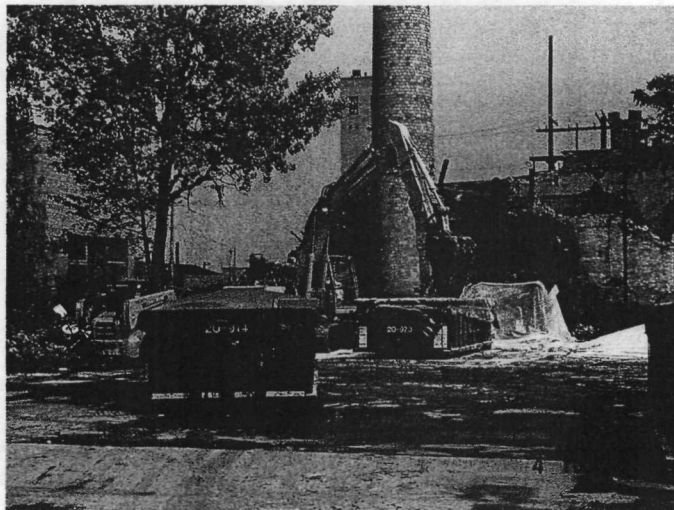
**PHOTO NO:** 22

**DIRECTION:** NE

**SUBJECT:** Sumps 9 and 10 with surface concrete removed.

**PHOTOGRAPHER:** M. Browning





**SITE:** IWI, Inc. Site

**DATE:** 4 August 2003

**PHOTO NO:** 23

**DIRECTION:** NW

**SUBJECT:** ERRS using excavator to load sludge from the Stack Building into roll-off boxes.

**PHOTOGRAPHER:** S. Meyer



**SITE:** IWI, Inc. Site

**DATE:** 3 September 2003

**PHOTO NO:** 24

**DIRECTION:** NW

**SUBJECT:** Excavator repositioning the rail car tank to allow for the drainage of the liquid material left inside the tank.

**PHOTOGRAPHER:** M. Browning